


FILED

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CLERK OF DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY: 

1 Mahmoud Mohamed Mahmoud
2 Mahmoud.mahmoud@aol.com
3 396 s California Ave#2924
4 West Covina, California 91793
5 Phone: 626.560.5101
6 Plaintiff in pro per

7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 **MAMOUD M. MAHMOUD**

11 **Plaintiff,**

)

NO.CV 15-7763-GW (KLS)

)

Jury Trial Demanded

)

Second Amended Complaint

)

For Damages & Injunctive Relief

)

Pursuant To: 42 U.S.C. 1983

)

12 **v**
13
14 **CORINNE LUNA, et al,**

)

)

15
16 **Defendants**

)

17
18 **Plaintiff Second Amended Complaint**

19 **To The Honorable Judges of The Set Court:**

20
21 **Jurisdiction**

22 1. This court has jurisdiction under 28 U.S.C.1331 Federal questions

23 Jurisdiction arises pursuant to 42 U.S.C.1983.

24 **VENUE**

25 2. Venue is proper pursuant to 28 U.S.C 1391 because the defendants
26 Are a federal government official the plaintiff lives in this district.
27

28 **Complaint**

Parties

3. Plaintiff "Mahmoud Mohamed mahmoud" a California resident who is Proceeding *pro se*, filling a second amended complaint alleging wrongdoing and race discrimination by numerous federal officers and private actors.

4. Defendant "Corinne Luna" is sued in her individual capacity as field office director at the department of homeland security district 23, located at 300 N. Los Angeles Street, Los Angeles, California 90012.

5. Defendant "Laura Patching"& Jane E.Arellano are sued in their Individual capacity as chief of the Office of citizenship and district director at department of homeland security district 23, located At: 300 N. Los Angeles Street, Los Angeles, California 90012.

6. Defendants Robert Cowan, James Mc cament and Susan M Curda are sued in their individual Capacity as chief of USCIS, and district director of the department of Homeland Security, district 23 located at: 300 N. Los Angeles Street, Los Angeles, California 90012.

7. Defendants "Linda Johnson" and "Mr. Danielle" are sued in Their individual Capacity as supervisor at the department of homeland security, district 23 Located at: 300 N. Los Angeles Street, Los Angeles, California 90012.

8. Defendants A. Bond, Claudia Escoto and Esther Castfieda are sued in their individual Capacity as employees of the department of homeland security, district23 Located at: 300 N. Los Angeles Street, Los Angeles, California.

9. Defendant officer Speec, USCIS, D23, and unknown officers and

Complaint

1 Finger print technical names from Application Support Center, USCIS

2 EL MONTE, 9251 Garvey Ave, Golden Vista Plaza, Unit Q, So. El
3 Monte, CA. are sued for their individual capacity.

4
5 10. Defendant Adam Pearl is sued in his individual capacity as
6 attorney of the U.S. Immigration Court located at 606 olive Street, Los
7 Angeles, CA 90014.

8 **Statement of Facts**

9
10 11. Since the United States of America federal laws prohibit discrimination

11 On the basis of disability, race, color, or national origin. And since that
12 I am very quiet sure, that there's "pattern or practice" that there is more
13 Than single incident of discrimination and that there is a policy or repeated
14 Conduct that is discriminatory.
15

16
17 12. I believe, I have been discriminated against, because of my race, color

18 Religion or my national origin, including limited English proficiency,

19 By the department of homeland security "district 23", directors, chief of

20 The office of citizenship, chief of USCIC (OLA) and supervisors and

21 Officers of DHS district 23, whom I mentioned their names, titles, and

22 Their work addresses, above in my complaint, those who pushed a large
23

24 Number of city of Los Angeles Mayors, city councils and entire Los Angeles
25

26 Police Departments to do so.
27

28 complaint

1
2 13. Plaintiff stating that, he faced a great course of harassment,
3
4 discrimination, and Very bad treatment, each time he goes, to the USCIS EL
5
6 MONTE, Application
7
8 Support Center, Located at: 9251 Garvey Ave. Golden Vista Plaza, Unite Q
9
10 So .EL Monte, CA91733, to have his photo taken and to do finger print, and
11 to Complete the process of his I-90 Application to replace Alien registration
12 Card USCIS A070532464 from the period Nov.1st,2006, to September,
13
14 2013 from Employees working at the office there, especially employees the
15 photos and finger Print.

16 14.Plaintiff stated that, the reason for that course of harassment,
17
18 discrimination and the bad treatment was because of Notice
19 Immigration Naturalizations
20
21 Services” dated June 13, 2001, which was sent by officer “M. Chica110”
22 the immigration and Naturalization services, 300 N. Los Angeles Street, Los
23 Angeles, California90012. [Exhibit A].
24
25
26 To the plaintiff previous home address located at:21707 Saticoy street,
27
28 Canoga Park, California, 91304.

Complaint

That letter notice from the INS. Created big trouble to the plaintiff, and made his Life miserable, and plaintiff faced too much harassment, and questioned from DHS“district23” and even told to leave the district, and not to come any more, by officers and supervisors district 23, and that no case from him at the district,

The reason the officer sent him the letter notice was inedited and in jail, and

Plaintiff does not have any thing to do with that, or any knowledge what ‘so ever,

And each time plaintiff goes there, to inquire about his case with DHS

“district23”. The last time plaintiff was there to get work permit,

On or about February, 2014, since he was granted Asylum by Judge

O’Sullivan, Judge the US. Immigration Court, on November 5th,

2013Since he has the right to obtain Employment Authorization Card.

Plaintiff, while he was at room #1001 at DHS, D23, to ask questions

complaint

The officer Lady (without uniform), thrown his paper work at his face

Plaintiff complained to her supervisor on duty, about her bad treatment, and her misconduct, the same day he was there.

Plaintiff asserting :on August 10, 1992 he adjusted his states,[Exhibit A]

On or about date October, 1992 , I left the united states, with approval advance parole ,Issued for me by the INS office located at Newark , Jersey City, State of New Jersey , as my request to go and visit my home country Alexandria , Egypt , the reason my family house was effected by the earth quick happened at that time.

The approval advance parole was delivered by me to officer the immigration at JFK air port, New York, New York State upon my arrival to the USA at JFK air port on date: **December, 26 1992.**"Exhibit A"

▪ **I paid for the green card more than five times, and is just the green card never comes, although I made an interview at the Immigration office,located at Newark new jersey , jersey city, on date Friday 9/24/1993** and copy notice attached and the interview was with Mr. ice supervisor office of the immigration at

○ complaint

Newark , Jersey City, the State of New Jersey. After the interview
Mr. ice told me to go home and you will receive the decision mail.

Complaint

- On or about Oct.31,1995, I applied for Employment Authorization and
- I received denied for my application, while my residency in New Jersey.

- **on date July 4th,1998**,when I arrived, to LAX Airport, the State of
- California, trying to find work , I applied for employment authorization to
- Work, on year 1999 and I received approval for my application.
- **On Year 2001 I tried to renew my work permit**
- Ins ,Los Angeles, denied my case for the application I-765 and send me the notice : that the reason for the denial :

**“The applicant is a law full permanent resident, if your client has
Not received an Approval notice and /or the alien registration card,
filing an
I-90 may be necessary.”**

- (Copy attached). I believe, this notice dated **06/13/2001** was as a Result to :
- my interview, with supervisor the immigration office , Newark , jersey city New Jersey 07103 on date, August 16, 1993 or Friday, Sep. 24th, 1993 [Exhibit]
- This was never received during my residency at the state of New Jersey.

1 On or about May 6, 2002 I had false arrest; my property was attacked by
2 LAPD, US. Customs Border Protection (ICE), and other (DA) detectives

3 Complaint

4 Plaintiff asserting, on or about August 24th, 2002, I turned my application
5 for Adjustment of Statues to A Lawful Permanent Resident , since I have
6 Document dated June 13, 2001, from the same office , saying that ‘: The
7 Applicant is a law permanent resident, Filling I-90 well be necessary.

8
9 That’s why I turned my application for Adjustment of statues under the
10 registry law, To Ms. **A Bond** ” officer immigration in DHS, Los Angeles.

11
12 **Defendant Ms. A Bond**, badge #110, immigration officer, was at all the
13 times working at:
14 Room 1001, Department of Homeland Security, located at: 300 N.
15 Los Angeles Street, Los Angeles, CA 90012 .sued for her individual
16 capacity Ms. A Bond requested from me to come to check on my application
17 after one to three months.

18
19 .On and about September 2 9th, 2002, I was there at Ms .A Bond office to
20 check on my application for a law permanent resident and to obtain a green
21 card, Ms. A Bond and her supervisor [white American Lady] both gave me a
22 very hard time, and advised me to go home, before they call the security on
23 me , both were claiming that I do not have A case with them , and they are
24 going to terminate my immigration file: A070532464 .

25
26 I remember when that happened on date December 9th, 2002, I went to the
27 next officer, next to window Ms. Bond and I was shocked, because of
28 treatment Ms.

1 A Bond and her supervisor that day, the officer next to Ms. Bond explained
2 to me to go upstairs to office "MOTION TO REPON RECONSIDER" to

3 Complaint

4 have my immigration Case our subject # A070532464 to reopen and
5 reconsider again , I did and I have the receipt #0116 dated December 9th,
6 2002 from THE US DEPT OF JUSTICE, INS LOS ANGELES. EXHIBIT

7
8
9 On or about March 30, 2003 they sent me "A Notice of termination" letter
10 attached dated 03/30/2003, asking me to leave the USA. [EXHIBIT A].

11
12 31, from year 2003 to year 2005, I tried to get work permit, each time I go
13 To office The DHS, district 23, I face harassment and race discrimination,
14 for No Reason And the officers there, they tell me to go home and you well
15 receive the Decision On Your work permit by the mail, until I received
16 denied for my application for my work permit on year 2005.

17
18 32. On or about November 1, 2006, I tried again to get my green card by
19 applying one more time , and after , I paid the fees of amount us.\$190.00
20 Receipt # MSC 07-800-23170 , and after my photos and my finger print
21 were taken by office Application Support Center, EL MONTE,
22 CALIFORNIA. (Exhibit A)

23
24 33 On or about 8/01/2007 The department of home land security, asked for
25
26 my removal procedure to be processed by The US. Immigration Court.

27
28 **Case GA 051132, was file creation, false arrest, Assault, deprivation**

1 **And conspiracy.**(I was Arrested on 5/6/2002) see Pasadena defendants.

2
3 complaint

4 Since on May 5th, 2008, I turned my application to renew my Security
5 officer Guard Card#529365 to Bureau of Security and Investigative
6 Services, West Sacramento, California, and my application has been **denied**,
7 **because I did not** Reveal on my application the felony for my court case
8 #GA051132.

9 On or about date Sep.29, 2009 and after I appeared in-front of the

10
11 **“Private Security Disciplinary Committee, Bureau of Security and**
12 **Investigative Services”** (Exhibit A).

13
14 And I explained to the Committee, what happened on date May 6, 2002, and

15
16 Why I have a felony on my record, The Committee thankfully were very
17 much understood and they ruled in my side, and then on October 28, 2009 I
18 received the decision:

19
20 24. That the Committee ruled in my favor, and I should receive my
21 Certificate, within three weeks.

22
23 On or about June 6, 2008, I had “attempt to murder” Auto car Accident,

24
25 **Defendant:City of Baldwin Park &Defendant amira shalaby**

26 **Auto Car Accident 6.6.2008**

27 **34. On date June 6, 2008 defendant Ms. Amira Shalaby** committed

28 “attempt to murder” first and second degree on date June 6, 2008, she

1 Damaged my vehicle Lincoln town car front end completely, CA License
2 plate No.3WPK026 on St. Live Oak, Baldwin Park, CA. Inside waste

3 Complaint

4 Management San Gabriel valley. Police report no. **08-18522** by officer

5
6 Kamjia from Baldwin Park police department. And neither my insurance,

7
8 Nor she paid me any money, my Insurance policy number ACA021681582

9
10 and all state, claim adjuster refused to pay for my total damage more than

11
12 \$15,000.00 until now, although I complained to the California insurance

13
14 department. two times, however, California insurance dept. turned my

15
16 Complain down and covered my accident up, with all State. [Amira shalaby

17
18 Was Received US. \$1700.] From Affirmative insurance Company, my

19
20 insurance, and I fixed my vehicle on my own and my Insurance never pay
21 me. (Exhibit A).

22 My court hearing date was May 2nd, 2008, for the US. Immigration Court
23 located at 606 olive street, Los Angeles, California, 90014. and my next court

24
25 Hearing was November 7th, 2008.

26
27 . (This auto car accident happened after I Received Notice removal

1 Procedure and court hearing dated 08/01/2007).

2
3 Complaint

4 **Defendants City of Pasadena, et al**

5 36. On or about **sep.18th, 2008, Defendant Mr. Jerome**, was all the time

6
7 and time the incident happened resident at centennial place, 235 E. Holly St.

8
9 Pasadena, CA 91103, is sued for his individual capacity.

10
11 Since he committed crime, by dropping, two microwaves, next to my head

12
13 From third floor the Centennial Place, located at: 235 E. Holly Street,

14
15 Pasadena, CA91103, while I was performing my security Guard duty, since I

16
17 Was working for Access Control Security, INC. (Exhibit A)

18
19 Pasadena police department, and my company supervisor been notified by

20
21 the accident, same day and time, and property manager as well.

22
23 On or about March 10th, 2009 I received notice DHS approved for filling.

24
25 On or about **May 20, 2009: I had A poison Food in YMCA Glendale**

26
27 Defendants Name of City of Glendale, California are:

1 Mayor Ara Nigerian, city council Paula Devine, city council Laura

2
3 complaint

4 Friedman, city council Vartan Gharpetian ,Zareh sinanyan, and chiefs'

5
6 Police Robert Castro and Captain and officers City of Glendale, State of

7
8 California (All of them are sued for their official and individual capacity.)

9
10 I believe, I have been discriminated against, because of my race, color,

11
12 Religion or my national origin, including limited English proficiency by the

13
14 city of Glendale, city officials and police department, located

15
16 At: 813 E Broadway, Glendale, CA 91206- phone 818.548.4844.those

17
18 Whom receiving federal financial assistance.

19
20 Since The above mentioned city officials and police captains and officers

21
22 Names, been pushed by the department of home land security to harassing

23
24 And discriminating and "attempt to murder "me personally by Food poison

25
26 from the period May 20, 2009 until today date August 1, 2015

27
28 Police captains and officers of the city of Glendale still following me to

1 Each place I go, in Glendale city, either to conduct business, Or to buy

2

3

Complaint

4

Something for myself, which is not appropriate or acceptable, and that there

5

Is a policy or repeated conduct that is discriminatory.

6

7

8

Since On and about date **May 20th, 2009**, I had a poison food, while I was

9

living at YMCA,CITY OF GLENDALE, at the third floor of YMCA

10

building, the front desk manager of YMCA, Glendale, did not care about

11

me, he did not help with me necessary emergency medicine, and the

12

manager, and people in presence that time,

13

Were all watching and observing, even the cap driver living with us, refused

14

to take me, To Adventist Glendale center hospital even after I offered him

15

money.

16

Even, Glendale City Fire Department had me, walk on my legs to their

17

Truck

18

I was at Adventist Glendale center hospital emergency room on date

19

5/20/2009

20

21

I filled complaint with office California attorney general (exhibit)

22

23

***My next US. Immigration Court hearing date was on: August 7, 2009 at:**

24

606 South olive street, 14th.Floor Court Room G, Los Angeles, California

25

26

90014.And the one next to that one was January 29, 2010.

27

On or about March 10th, 2010 another notice for the green card application

28

receipt # MSC 07-800-23170.

Defendants Temple City & owner the Apartments . Building
7000&7016 ROSEMEAD BLVD SAN GABRIEL, CA 91775

complaint

On or about September, 2010:

Defendants Temple City Names:

**Mayor temple city Mayor Tom Chavez, Vincent Yu Mayor pro
Tempore**

**William Man Councilmember, temple city police department Captain
Coronne L. Jacob,**

**Deputy David March and Harold Blevins” all defendants are sued for
their individuals and official capacity.”**

Defendants Address: 8838 Las Tunas Dr. ,Temple City ,CA91780

I believe, I have been discriminated against, because of my race, color,
religion or my national

origin, including limited English proficiency by the city of Temple city
officials and police department, located

At: 8838 Las Tunas Dr. Temple City, CA 91780- phone: 626.285.7171.those
whom receiving federal financial assistance.

Since The above mentioned city officials and police captains and officers
names been pushed by the department of home land security to harassing
and discriminating and “attempt to murder “me personally from the period

September, 2010 until today’s date.

1
2 I had A deadly car accident on date sep, 2010 : I use to live at #7016 N
3 Rosemead Blvd. city of san Gabriel ,CA 91775 , The property has private
4 gated Parking Lot, [someone cut the alternator Sear belt for my

5 Lincoln Town car 97, CA Lice. Plate 3 WPK026. While I was driving on
6 Glendale Free Way, The Sear belt of the Alternator cuts off, and I lost
7 complete control on my vehicle then I hardly pulled over to the emergency
8 side of the Glendale free way, it was towed by city tow truck to

9 ANDY'S AUTO CENTER, INC

10 LOCATED AT: 925 s. Verdugo RD. Glendale, A 91205 for Repair. MY
11 NEXT COURT

12 HEARING REOMVAL PROCEEDING DATE WAS OCT.01, 2010. At
13 The US. Immigration court, 6 olive street, L A, CA 90012.

14
15 Police captains and officers of the city of temple city still following me to
16 each place I go , in temple city ,eit

17 **Defendant Mr.Robert M.Cowan, Director HDS"district23"**

18
19
20 69. On or about September 14th,2010 Defendant Director Mr. Robert
21 M.Cowan ,"/LA0095" (sued for his official and individual capacity), the
22 reason for that: Mr. Robert

23
24 On 09/14/2010, cancelled and stopped production of My Green Card

25
26 Application Receipt #MSC-07-800-23170, which was approved on March

27
28 10, 2009, and Also approved on Feb.22, 2011,[page 50, 51, 68,69 from my

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28

FOIA File # A070532464] [Exhibit].

“Came on” notice denied decision” dated 9/14/2010,

Upon consideration, it’s ordered that your application to replace permanent Resident card [form I-90] filed on November 1,2006 pursuant to Title 8, Code of Federal Regulation, Part, 264.5 be **Denied** for the following reason:

“ An-I-90 application filed ..must include the prior permanent resident card or other evidence of permanent residence or commuter status”

Although I included notice the INS, dated June 13th,2001, and the approval notice from USCIS, dated March 10th, 2009 as support evidence, however,

Mr. Robert Cowan ordered that my application.

To replace permanent resident filed on November 1st, 2006 to be denied, without appeal to that decision .

Which is neither fare for me nor for my family, since I am legal alien with Green Card, I came Legal and I am in the USA., for more than 27 years, been prevented From seeing my family for long period of time exceeded 17 years, been treated

1
2 Treated Unfairly eit her to conduct business, Or to buy Something for
3 myself, which is not appropriate or acceptable, and that there
4 is a policy or repeated conduct that's discriminatory.

5
6
7
8 on or about Nov.5th,2010 I contacted the U.S. Department of Homeland
9 Security, USCIS, on to inquire on the status of my I-90 application Receipt
10
11 MSC 07-800-23170.
12

13
14 36. On or about Monday, November 8, 2010, I received by mail their
15 respond to my inquiry[from DHS, USCIS, 300 N.LOS ANGELES
16 STREET, LOS ANGELES, CALIFORNIA 90012 on the status of my I-90
17 Application to replace Permanent Resident Card. Their letter respond said
18 that the USCIS **denied** my I-90 case receipt #MSC-07-800-23170, and a
19 notice explaining their decision was sent on July 29, 2010, To the address
20 they have on file , and they are not able to extend the period for me to file
21 Appeal from this decision. Therefore, in order to re-apply, you will need to
22
23 File a new I-90 Application.
24
25
26

27 **On or about December15th, 2011: I had A Truck Accident**
28

Defendants City Of Los Angeles

Defendants City of Los Angeles Names:

Against Mayor and city council of city Los Angeles and Both Chief Los Angeles

Airport& city of Los Angeles Police Department Supervisors and Police officers

Address: 100 w 1st. Los Angeles street. Los Angeles. CA90012

I believe, I have been discriminated against, because of my race, color, religion or my national origin, including limited English proficiency, by those city officials and police supervisors and officers of the city of Los Angeles , And LAX airport both chief police

Departments mentioned in my complaint, those who receiving federal financial assistance, for the following: “attempt to murder” first and second degree,

Police misconduct, harassment, discrimination and police brutality.

1.Pushing captains ,supervisors, officers city of los Angeles, Participated with the department of home land security [300 N .Los Angeles Street,

Los Angeles, California 91001] , right after I received Notice “Removal procedure and to appear in U.S. Immigration court [notice dated 8/01/2007]

To “attempt to murder” me personally, by causing me serious automobile

1
2 accident on date 12/15/2011:

3
4 My car ford escort model 1999 accident on December 15, 2011

5
6 1. Distributing notice to the California bar association, and all law

7 2. Offices , in the state of California, to not to take on my court case

8 #BC524336 at Stanley mock Courthouse

9 3. Notifying the three law offices on my "attempt to murder" first and

10 Second degree to consider it regular car accident

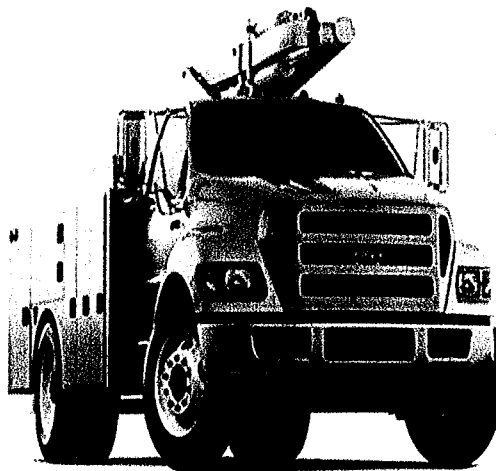
11 And causing me and my family serious financial hardship, and not to show

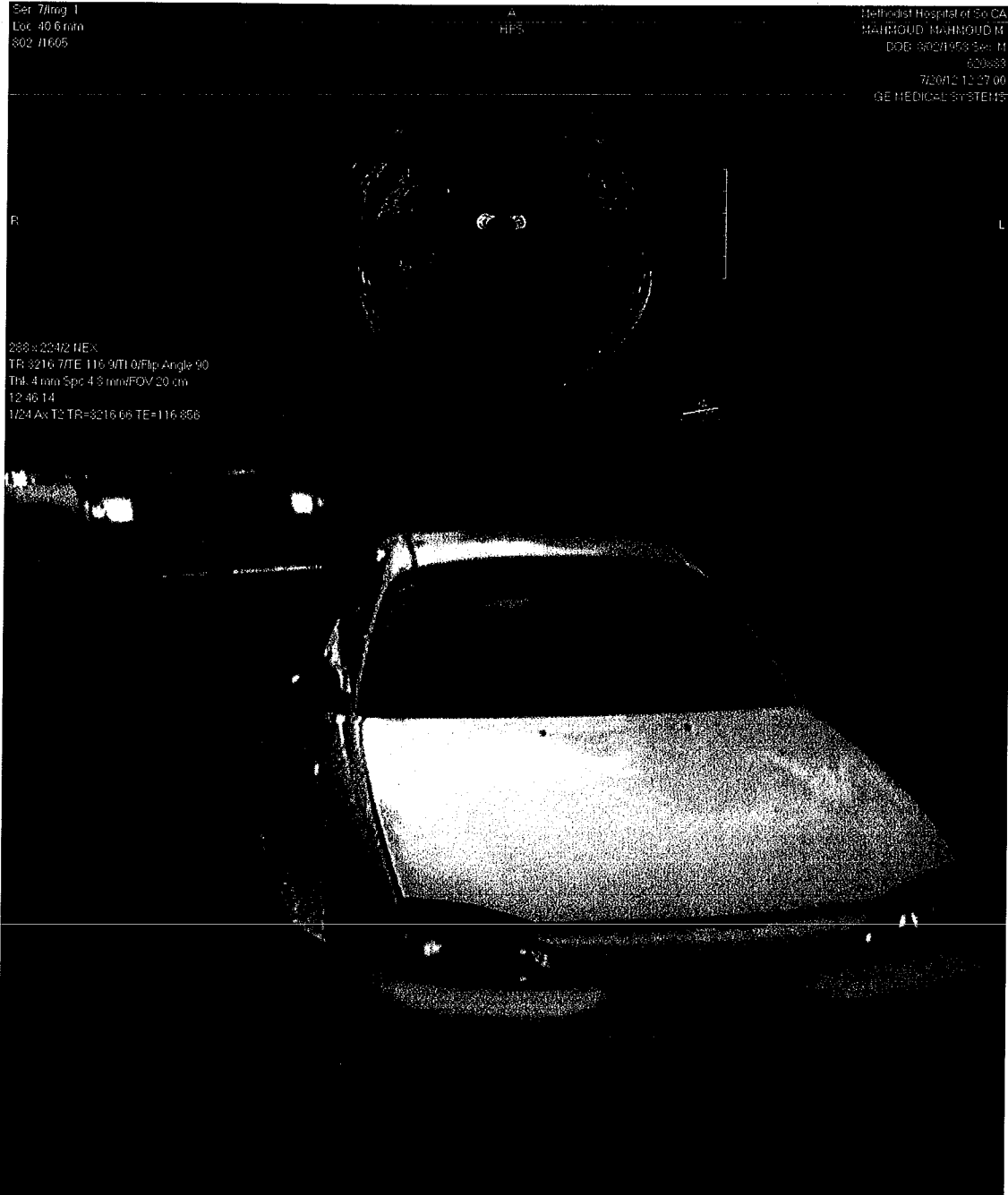
12 Up in court trial date April 1, 2015, April 15, 2015

13 Due to that I lost my case, after West Covina police department, police
14 harassment and brutality on date 04/14/2015

15 Which prevented me from showing up in court hearing date 4/15/2015

16 [details enclosed down my complaint]





- MY CAR FORD MODEL 1999 WAS DAMAGED COMPLETELY ON THE STREET :E/B LOS FLEIZ Blvd. W/B Hobart PL. LOS ANGELES CALIFORNIA – Police Report available
- ON DATE: DECEMBER 15, 2011. Time: 4:00PM.

Defendant Adam Jacob Bar Wick, et al
Truck driver damaged my auto car Ford escort model 99

38. On or about **December 15th, 2011**. TRUCK DRIVER MR. ADAM JACOB

BAR WICK, OWNER ADAM BAR WICK ELCTRICIRT ET AL, SUED

FOR His individual, and his corporation capacity, since on or about

December 15,2011 time 4:00PM on the Street: E/B LOS FLEIZ Blvd. W/B Hobart PL. LOS ANGELES CALIFORNIA – Police Report By officer

Noriega, ram 2A91 □ Serial Number 40572.

39. Driver the electricity truck Mr. Adam Jacob Bar wick, damaged my Vehicle.

40.Came very speeding from my left side to my lane left side and hit my vehicle, And injured me very Badly.

41.I sustained injuries to my Neck, lower and my upper back ,left side arm And shoulder, I been diagnosed Inguinal Hernia, As well As Multiple Herniated disk in my Spine.

1 42. Due to these injuries, I to avoid prolonged sitting, standing, and
 2 prolonged Standing.

3
 4 43. Driver the electricity Truck Mr. Adam Jacob Bar Wick, Was main intend
 5 and purpose is to get me killed, since I get hit by him and his Ford super
 6 duty truck, CA lic. plate #6U22740 from my left side driver vehicle [Ford
 7 Escort 1999] Ca license Plate #5DWV720 and I believe he is "an
 8 attempting To Murder" First and second Degree.

9
 10 44. since: Mr. Adam Bar wick ,time my car accident , Mr. Adam saw me by
 11 his right side mirror of his ford F450 super duty truck color white
 12 VIN#IFDXW46F91ED86899. And although I was yelling and screaming to
 13 him hey ..hey..hey stop .. stop. stop , however, Mr. Adam still and
 14 continuing pushing me hardly to the street of Los Fleiz Blvd .Pavement. I
 15 am quite very sure that Mr. Adam Bar wick by doing so, he is to be Found
 16 "Attempt to murder "with First and second Degree.

17
 18 45. On December 15, 2011, I was operating my vehicle in a reasonable and
 19 prudent manner, with due caution and regard for the motor vehicle laws of
 20 the State of California.

21
 22 46. **Defendant Adam Bar wick**, failed to maintain control of his truck and
 23 With unreasonable speeding, from far left side crossed over the center lane
 24 of my left side vehicle, striking, the left and my front end side vehicle.

25
 26 **COUNT I**

27 47. NEGLIGENCE (DEFENDANT ADAM BARWICK)

28 complaint

1 Plaintiff here by incorporate paragraph No.38 to No. 46 of this complaint
2 fully as if the allegations were set forth fully herein.
3

4 48. Defendant Adam Jacob Bar wick had a duty to act reasonably and use
5 due care while driving.
6

7 49. Defendant Adam had a duty to pay attention to traffic, to maintain a
8 proper look out, to obey traffic control devices, to obey the laws and rules of
9 the state of California.
10

11 50. To maintain proper speed of the condition, to reduce the speed of his
12 truck to avoid an accident, to maintain a proper distance between vehicles, to
13 stay to right side of the road.
14

15 51. To maintain his vehicle within his lane and to pay full time and attention
16 to the operation of his vehicle and to avoid collision.
17

18 52. Defendant Adam Bar Wick breached that duty of due care by failing
19 To pay proper attention to the roadway and the traffic, failing to maintain a
20 proper lookout, failing to obey the traffic control device, failing to obey the
21 laws and rules of the state of California.
22

23
24 53. Failing to maintain a proper speed for the conditions, failing to reduce
25 speed of his truck to avoid an accident .
26

27 54. Failing to maintain a proper distance between vehicles, by failing to
28 control the vehicle in order to avoid a collision, failing to maintain his

1
2 vehicle in his travel land and collided with plaintiff's vehicle.
3

4 55. As a direct and proximate cause of the negligence of defendant Adam
5 Bar wick.
6

7 56. Plaintiff Mahmoud suffers from permanent Physical injuries.
8

9 57. Conscious mental anguish, pain and suffering in the past and in the
10

11 Future, past medical expenses and future medical expenses.
12

13 58. All of the above damages were directly and proximately caused by
14

15 The aforementioned negligence of defendant Adam Bar wick, and were
16

17 Incurred with contributory negligence or assumption of the risk on the part
18

19 of plaintiff, or an opportunity for plaintiff to avoid the accident.
20

21 WHEREFORE, plaintiff Mahmoud Mahmoud demands compensatory
22

23 Damages against defendant Adam Jacob Bar Wick in the amount of
24

25 ONE MILLION DOLLARS(\$1,000,000.00) plus costs , pre-judgment
26

27 Interest, and post-judgment interest as this court deems appropriate.
28

COUNT II

NEGLIGENCE (DEFENDANTS ADAM BAR WICK ELECTRICITY
ET AL).

59. Plaintiff hereby incorporates paragraph No.38 through No.58 of this
complaint fully as if the allegations were set forth fully herein

60. Defendants Adam Bar Wick Electricity et al had duty to plaintiff to act
Reasonably.

61. Defendants Adam Bar Wick Electricity et al breached that duty

62. As a direct and proximate cause of the negligence of defendants

Adam Bar Wick Electricity et al, plaintiff suffers from permanent physical
injuries, conscious mental anguish, pain and suffering in the

Past and in the future, past medical expenses and future medical expenses.

63. All of the above damages were directly and proximately caused by

The aforementioned negligence of defendants Adam Bar Wick Electricity et
al, and were incurred without contributory negligence or assumption of the

complaint

1 Risk on the part of plaintiff, or an opportunity for plaintiff, to avoid the
2 accident.

3
4 WHEREFORE, plaintiff mahmoud mahmoud demands compensatory

5
6 Damages against Defendants Adam Bar wick Electricity et al, in the

7
8 Amount of ONE MILLION DOLLARS (\$1000, 000.00)plus costs, pre-

9
10 Judgment interest, and post-judgment interest as this Court deems

11 Appropriate.

12
13
14 **REQUEST FOR JURY TRIAL**

15
16 64.Plaintiff Mahmoud M mahmoud , prays for a trial by jury on all issues.

17
18
19 **US.IMMIGRATION COURT HEARING**

20 **ON December 16TH.2011 at 8:00AM**

21
22 65. On December 16th, 2011, I had to go the US. Immigration for removal

23
24 Procedure court hearing, located at: 606 olive street, Los

25
26 Angeles, California 90014. Although I had A truck accident a night before.

27
28 66. Waiting for me over there, was defendant Attorney Mr. Dante Valera

complaint

Since arrangements were made with him two weeks before to assist me with

My case at the US. Immigration Court, Mr. Dante requested 6 month's to study

My court case , and to request (FOIA) freedom of information act my file.

67. Judge the US. Immigration Court Ms.O'Sullivan approved Mr. Dante

Request for 6 month's period of time and my next court hearing was 07/13/2012.

68. Defendant Attorney Dante Valera, Bar No.249065, his office address, at

3325 Wilshire Blvd.room754, Los Angeles, California, phone 323.719.7499,

knows very well that there is" Fraud" been committed by Department of Home

Land Security," D23" and Aplenty of information been missing, pages, hided

Or disappeared from my [FOIA] file A #070532464, Mr. Dante, withdrawal

Himself right after court hearing December 16th, 2011, his excuse, was

1 because, I was late on paying the rest of his attorney fees, that's why, that
2 was not

3
4 True, Mr. Dante did favor to HDS, d 23, and I complained to the Bar
5 Association.

6
7 complaint
8 , I have been discriminated against by the entire directors, supervisors and

9
10 officers of the department of home land security, District23, entire Los
11 Angeles

12
13 Law Enforcement, the US. Customs Border Protection, other Government

14
15 Agencies such as department of social services, Department of human health
16 care services,

17
18 The Social security Administration, Care 1st, Health care provider, and even

19
20 My Bank Chase J,P. Morgan also harassed me , all of that because of the

21
22 Way Been treated, by the department of Home Land Security district 23. I
23 filled more than two complaint with office of home land security, Civil
24 Rights and Liberties one on December, 2014, and the second one on July 4th,
25 2015, however I never received any respond so far.
26

27
28 Complaint

1
2 On or about: January 19,2012 I did made current case status for form 1-90,
3 application to replace alien Registration card and the result update saying:

4 **Oath Ceremony and Card Production**, But The DHS, never sent me
5 or issued for me, **Green Card**.

6 On July 30, 2012,officer Mr.Speece from DHS "D23" denied my
7 Application for getting my US. Citizenship, during the interview , the officer
8

9
10 in charge , Mr.(Speece) asked for my green card, which the USCIS Never
11

12 Issue or send me one, this is a Catch -22 not of my creation.
13

14 On or about date: 06/3/2013 Time: 1: pm.
15

16 Defendants names of City of Irwin dale and it's Police Department

17 Defendants : Mark A. Breceda, Mayor City of Irwin dale

18 Manuel R. Garcia, Mayor Pro Tem, Albert F. Ambriz,
19 Council member, Julian A. Miranda,
20 Council member, H. Manuel Ortiz, Council member,
21 Anthony Miranda Irwin dale chief police
22

23 Detective sergeant George zendejas
24

25 and police officer Cory Badge #777.
26
27
28

1 I believe , I have been discriminated against , by those , mentioned above,
 2 who receiving federal financial Assistance.

3
 4
 5
 6 **A. IRWINDALE POLICE DEPARTMENT HARASSMENT AND MISCONDUCT:**

7 Officers of Irwin dale police department are keeping following me to each
 8 place I go, from star buck, to Macdonald to Arco gas-station until chevron
 9 gas-station city of Irwin dale , day and night, either police officers in
 10 uniform or undercover Cops ,doing favors to their partners Baldwin park
 11 police department and West Covina police department.
 12
 13
 14

15 **On June 03, 2013:** while I was at The US. Immigration court located at 606
 16 olive streets,

17 LA, CA 91014. for my court hearing removal proceeding with honor Judge

18 Sullivan ,

19 and my attorney Ms Nancy and officer The DHS , my space storage #
 20 k066B at the public Storage located :15534 ARROW HWY, Irwin dale
 21 ,CA91706 , someone removed my expensive items and my merchandise,
 22 along With my business important documents for total loss of the amount of
 23 US. \$3768 .00.

24 Police report #13-0697 on date 06/05/2013 by officer Many Compose from
 25 Irwin dale police department, enclosed for your kind attention
 26

27 I filled my small claim against both the public storage and SIDGWICK, the
 28 insurance company

At Alhambra courthouse, city of Alhambra, California. Small claim case #ALH13G05607 "THE JUDGE DISSMISED my case And ruled in the favor of both the public storage & Sedgwick the insurance co., although there's An Video surveillance at manager the public storage office, which if Judge Alhambra Courthouse asked for, I would won my small claim case but the judge did not do so and his final decision was "defendant does not owe plaintiff any money on plaintiff claim"

Still City officials and chief police and officers of city of Irwin dale, harassing, discriminating and following my car to each Place I go or I conduct business with inside Irwin Dale City, state of California until today date August 7, 2015.

Also while I was driving, to Irwin dale police department to get a copy from police Report # 13-0697, Officer Mr. Cory, pulled me over and harassed me, questioning me who owns this car? And then issued speeding ticket# 152569 on date 7/3/2015

Inside Parking Lot and in front of Irwin dale police Dept. for No Reason.

Defendants West Covina, Social Security Administration
Application date July 3rd, 2013

39. On or about **July 3rd, 2013**, I turned my application for disability, and SSI to Defendants **Ms. Harvey** and **her supervisor**, at **Social Security office west Covina ,State of California.(Exhibit)**

Both defendants delayed process my application for SSI, from 07/03/13

To-the period October 22, 2015, which it caused me and my entire

1 Family serious financial hardship, just a little part from my due SSI
2 Was received recently on October 22,2015.

3 **Auto car accident July 18th, 2013At City of Pasadena**

4 **Defendant driver Elivd Garcia &Gerardo Rodriguez**

5 **On July 18th, 2013** , while I was driving my auto car Ford Focus, 2002,
6 California License plate # 4WTP013, on Lincoln Ave., Pasadena, CA,

7
8 I and my vehicle were hit by Gray Jaguar model 2004 California License
9 Plate , 6w0z359. since the jaguar driver run the stop sign, and pulled in front

10
11 of my Car Damaged the front end of my vehicle completely, and inside his

12
13 vehicle , were Three passengers, and the jaguar driver was driving with
14 CVS pharmacy id card,

15
16 And without Ca. driver license at all, Pasadena police report13010247.

17
18 ***My next court hearing date was September 12, 2013**

19 **Defendants:Mr.Carlos manager Baldwin park Chase bank, J.P.**

20 **Morgan,**

21 Address:14483 E.Ramona, Blvd, Baldwin park CA91706

22 2. Chase international & Domestic Collections at:

23 P. O. Box 2668 Houston, Texas 77252.

24
25
26 41.On or about August 13th, 2013 :Mr Subaro Hayashi President Daiichi
27 Kosho Co., Ltd. 5-26 Kita Shinagawa 5-Chome Shinagawa-Ku, Tokyo 141-
28 0001 . Mr.Saburo Contacted me with email message to help him in the

1 process to review proposed transactions for acquisitions or purchase of
2 businesses and creation of contracts for acquisition [merger].

3 After we both signed the business agreement, Mr.saburo contacted me again
4 with email message

5 Stated in his email message that his default customer IBS Electronics, Inc
6 want to make concessions immediately we inform them of our legal
7 intention. They want to beat litigation and as issued a payment

8 For an installment payment of \$350,000 which you should receive by Friday
9 8/9/2013

10
11 On August 13,2013 I received the check of \$350,000 and immediately went
12 to chase bank Baldwin park To deposit the check inside the branch, the teller
13 was not able the deposit the check, then he called

14 Mr.Carlos the bank branch , who in turn deposit the check and credit my
15 company business account #163109180 for total amount of \$350,000, but if
16 you examine my company business account bank statement on august
17 13,2013 you will find that the bank manager did not record the transaction

18 (In) either he did not recorded it,(out) when he accept the check later same
19 day to send it for collection.

20 Mr. Carlos the chase branch manager to be honest with you, I was not
21 interested in his business when conducting the \$350,000 check transaction
22 and I was not comfortable in doing business with him at all.

23 Let's go back to the same day I was at chase Baldwin branch, please see
24 what happened from Mr. Carlos the chase bank manager after he deposited
25 the check he gave me receipt with total the \$350,000, But After, I left the
26 bank and after approximately 7-8 minutes he called me on my cell phone, I
27 answered him he said : Please come back and pick-up your check [\$350,000]

28

1 , I questioned him : Is the check bad or something ? he answered not at all,
2 but your client suppose to wire you the amount, you need to come now and
3 pick-up the check please . so I drove back to the bank and I asked him to
4 send the check

5 For collection, he prepared the necessary forms to send the check for
6 collection and I signed, but after Less than 10 days , the chase bank
7 international and domestic collections it's address above returned the check
8 unpaid [reason refer to the maker] and what they charged me amount
9 \$101.15 collection fee.

10
11 I filled my complaint against Chase Bank Baldwin Park Branch Manage and
12 Their corporation with California department of Fair Employment and
13 housing

14
15 And with office of the Comptroller of the Currency, 1301 McKinney street,
16 suite 3450, Houston, Texas 77010-9050.

17
18 And still the issue unresolved.

19
20
21
22
23
24 . PLAINTIFF stating, that: defendant Attorney the US. Immigration Court,

25
26 Adam Pearl, accused, the plaintiff, on court hearing removal procedure, on
27

28 September, 12, 2013, by trying to push Judge O'Sullivan, to not to approve

1
2 His Application for asylum, PLUS the defendant was accusing him by
3 making the fun

4
5 of the plaintiff, dealing with the plaintiff in disrespect, inside the hearing
6 court

7
8 Room, and in-front of the US. Immigration Judge O'Sullivan [video camera

9
10 located at the court hearing room, as evidence]. And discussed the Viagra
11 pillsCase: GA051132, with the plaintiff, Although, that Case: GA051132
12 was dismissed on date: Thursday, 06/27/2013.

13 Defendants From #4 Paragraph 6 to #10 paragraph 26:

14 Hold it my green card A070532464 [the one was approved on 3/10/2009
15 (copy approval Exhibit).
16
17

1 On September 24, 2013, the defendant employees of DHS, were found that
2 They are hiding and withheld information from my documents and records
3 With the USCIS, Pursuant to exemptions of the FOIA and Privacy Act,
4 Without my known [email my previous attorney with the FOIA letter Ex.].
5 As a result of the forgoing, my world has been turned upside down. With
6 What are clearly DHS blessings; I have had a number of documents able,
7 Unwarranted ongoing harassing encounters with law enforcement from
8 The following jurisdictions:

9 ☐ Los Angeles LAPD

10 ☐ Baldwin Park police department

11 ☐ West Covina Police department

12 ☐ Irwin dale Police department

13 ☐ Pasadena, sheriff's department for Altadena

14 ☐ Glendale police department

15 ☐ Temple City police department

16 21. The department of home land security "district 23" directors,
17 Chief of office of citizenship, chief of USCIS (OLA) and
18 Supervisors and officers of DHS, whom I mentioned their names,
19 Titles, and their work addresses above in my complaint

1 Violated Code section 10000, Government Code Section 11135

2
3 Defendant employees of DHS, "district23" passed my name to number of
4 US. Government agency such as the social security administration, to stop
5 my monthly Retirement pension, and to delay processing my social security
6 supplemental Income, from July 2, 2013 Until OCT,22,2015 date, my SSI
7 part was received. [Copy attached Exhibit]
8

9 This is causing me and my family members a serious financial hardship.

10 17. As a result of my interaction with The DHS, district23, and the
11 unresolved immigration status, I was placed on a "watch list", this has
12 resulted law enforcement agencies, having access to the list, being a ware

13 Of my presence thereon.

14 18. The defendants, also passed my name to the department of social service
15 Department of health care, care 1, the health care insurance provider, to my
16 Primary doctor, nurses, all hospitals doctors to harassing me, and to make to
17 make my life always in pain.
18

19 19. the defendants of DHS,"district23" had me and my entire family to face
20 And suffer from a serious financial hardship for more than 10 years, since
21 I was unemployed or working part time mostly of the time.[exhibit].
22
23

24 FILING DISCRIMINATION COMPLAINT AGAINST THE SOCIAL
25 SERVICE IN LA, STATE OF CALIFORNIA
26
27
28

1 Defendant The social service, county of los Angeles ,State of California
 2 ,Health and Human services Agency, 092 HAWTHORNE MEDI-CAL
 3 REGIONAL, PO.BOX 5011, HAWTHORNE, CA90251, sued for their
 4 Individual and official capacity as federal government agency or municipal
 5 Identity.

6
 7 For HARASING, DISCRIMINATING, THREATINING ME BY
 8 SENDING MORE THAN ONE NOTICE OF ACTION [MED-CAL
 9 TERMINATION] ONE ON YEAR 2013, AND THE SECOND ON
 10 10/20/2014.

11
 12
 13
 14 **Defendants Care 1st, and other hosiptal doctors**

15 **42.** on Feb.Sunday16, 2014:defendant Car1st, refused to do
 16 neurosurgery for plaintiff neck and lower back , since the cost well
 17 Be more than US\$300,000.00 and their insurance well never cover.

18
 19
 20 Defendants:Kaiser Permanente,Baldwin Park, doctor "Espitia,
 21 Dennis" through me out from the Emergency Room,
 22 PARTICIPATED WITH HIM, KAISER SUPERVISOR, AND 3
 23 SECURITY OFFICER, after 55 minutes from admission.

24
 25
 26 I called 911 on date: SundayFeb.16,2014 , I had cornice Neck Pain , with
 27 severe Pain for both right and left shoulder, severe left arm pain, Plus lower
 28 back pain for more than 5 days, until no more I can wait and I became

1 completely disable, ON Sunday 16,2014 TIME 8:35 AM, I asked my
2 neighbor Ms. Marcela to call the ambulance for me , she did and the fire
3 department came first then the ambulance from the city of Baldwin park ,
4 after asking me several questions they picked me-up, that time I remember I
5 asked the ambulance to take me to Methodist hospital in the city of Arcadia,
6 California, the gentleman driver was driving the ambulance insist to take me
7 to Kaiser Permanente Hospital located at: BALDWIN PARK BLVD., OFF
8 OR 10 FREE WAY AND FRANSISCITO AVE., CITY OF BALDWIN
9 PARK, CALIFORNIA.

10
11 I reached the emergency room around 9:50 THEY ASSIGNED A ROOM
12 FOR ME #10 THEN THE NURSE CAME TO CHECK THE BLOOD
13 PRESURE, THEN DR. ESPITIA, DENNIS CAME TO EXMINE ME
14 AND HE ORDERED THE NURSE TO GIVE MOROFEEEN SHUT, I HAD
15 THE MOROFEEEN SHUT, AFTER APP. 15 MINUTES THE ENTIRE
16 PAIN CAME BACK AND EVEN WORSE.

17 THEN ANOTHER NURSE CAME AND SAID THAT I HAVE TO GO
18 HOME SINCE DOCOTE DENNIS WORTE DISCHARGE FOR YOU, TO
19 GO HOME AND COMPLIETE TREATMENT SINCE THE PAIN IS NOT
20 GOING TO GO AWAY RIGHT A WAY.

21
22 MY ANSWER TO THE NURSE THAT THE ENTIRE PAIN TO MY
23 NECK AND BOTH SHOULDER AND THE LOWER BACK PAIN
24 CAME AGAIN AND EVEN MORE WORSE THAN BEFORE AND I'M
25 NOT ABLE EVEN TO MOVE SINCE I 'M VERY DIZY AND I MAY
26 NEED TO STAY FOR MORE MINUTES UNTIL I CAN GET MY SELF
27 A RIDE HOME.

28

1 HE SAID THAT THIS THE INSUTRUCTIONS FROM DR. DENNIS
2 AND I NEED TO LEAVE THE HOSPITAL NOW, SO I ASKED HIM TO
3 CALL THE SUPERVISOR FOR ME, AFTER A FEW MINUTES THE
4 SUPERVISOR ALSO INSIST AND EVEN SHE BROUGHT WITH HER
5 MORE THAN 3 SECURITY OFFICER TO KIKE ME OUT OF THE
6 EMERGENCY ROOM,
7 THE 3 SECURITY AND THE SUPERVISOR LEFT ME AT THE KAISER
8 PERMENANTE PARKING LOT.
9 SINCE I 'M STILL IN SERIOUS ILLNES AND VERY BAD
10 CONDITION, I CALLED 911 AGAIN TO TAKE ME TO ANOTHER
11 HOSPITAL SINCE THE KASIER DOCTOR [DR.DENNIS] REFUSED
12 TO TAKE CARE OF ME AND THROUGH ME IN BAD HEALTH
13 CONDITION.

14
15 Came with the city of Baldwin park the fire department and the police
16 department of city of Baldwin park “ POLICE OFFICER MR. LE” was
17 there on the site of Kaiser hospital parking lot and I did talked to him and I
18 did explained to him briefly ; on the misconduct and wrongdoing from : Dr.
19 Dennis, the hospital supervisor, and the three security guards working for
20 the Kaiser Permanente , he made a note of it and hand me his business card
21 so I can file for law suit and pass it to my attorney.

22
23 The second ambulance dropped me off at Citrus valley emergency room,
24 DR. RANDY K GILMAN, TOOK GREAT CARE OF ME, HE EXAMINED
25 ME VERY WELL AND COMPLETE EX-RAY TO THE NECK AND
26 BOTH SHOULDER,
27 ORDERDED TWO SHUTS FOR ME , GAVE ME GREAT
28 PRESCRIPTIONS WHICH IT TOOKS CARE OF THE SEVERE PAIN

1 IMMEDIATELY, AND I LEFT HOME MORE THAN HAPPY WITH HIS
2 GREAT SERVICE , I LEFT THE EMREGENCY ROOM OF THE CITRUS
3 VALLEY AT 6:45 PM AND REACHED MY HOME 8:00 MP02/16/2014.

4
5
6
7
8 **Defendants Medical Malpractice**

9 **Dr. hubart and Dr. Edwin Kok ,Southern California Heart Center**

10 43. on or about June 9th, 2014

11 1. On June 9, 2014 I did the ingograma at Garfield medical center located:

12
13 2. **Address:** 525 North Garfield Avenue, Monterey Park, CA 91754

14 **Phone:**(626) 573-2222

15 The doctor name did the ingograma his name was Dr. Yih Jen (Edwin) Kok

16 And his one among those group doctors managing and taking care of
17

18 patients with heart problems, at their own clinic, located at: southern
19 California heart center ,506 west valley blvd.,
20 Suite #100,san Gabriel ,CA 91776 , their phone# 626.308.3800.

21 **Complaint**

22 The doctor referred me to Dr.Edwin was Dr. Chow Hubert to do the

23 ingograma procedure , But I did the ingograma on June 9, 2014 and until
24 today May 4, 2015 and I Am not feeling ok none anymore, because of
25 wrong doing and the malpractice of both doctors I mentioned above .

26 After I saw both doctors on June 7,2014 and after I did the ingograma
27 procedure on June 9,2014

28 By the chance Dr. Edwin allowed for me to follow up with him only one
time [date June 13,2014] I tried to ask for more follow up, with Dr. Edwin

1 but their office at southern California heart center ,506 West Valley Blvd.
2 Suite 100 , san Gabriel, CA91776 refused , and told me I that I need to have

3 one of their insurance group and in order for me to check with dr. Edwin,
4 which I was not able to get it, and I only have care first insurance provider
5 .office DR.EDWIN advised me to follow up with my primary DR. in case I

6 Am not able to get them the required insurance group they asked me for.

7 After dr. Edwin did the ingograma procedure for me I start to suffer and
8 until now from the following :

- 9 • Chronic sever pain at my left arm and at my lower back
- 10 • “Arthritis“ inflammation in joints and the connective tissue
- 11 surrounding them, this inflammation is causing me pain, stiffness and
- 12 • swelling in the affected joints or even the spine, and it’s start to affect
- 13 my both hands and legs already.
- 14 • My vision becomes weak
- 15 • Numbness and tingling sensation in the shoulders and arms, loss of
- 16 sensation in the arms and weakness
- 17 • Headaches that seems to originate in the back of the skull
- 18 • Loss of balance
- 19 • Shortness of breath
- 20 • Discomfort and pain in my back, my neck, jaw, stomach and my left
- 21 arm
- 22 • Nausea or vomiting
- 23 • Lightheadedness, sudden cold sweat, especially with breathing.

24 For the harm and the disease they did caused me with their wrong doing, and
25 malpractice.

26 Since my left arm disable in total, plus suffering from entire sever pain at my
27 neck and upper And lower back pain which does not let me to sleep at night
or walk at the day time...I live In pain.

28 I filled my complain against both Dr.Edwin and Dr. Chow Hub art with the

1 County of Los Angeles Department of Consumer Affairs.

2
3 **[My case number: DR15-0507 date: January 13, 2015 requesting A**
4 **mediation] County of Los Angeles Department of consumer Affairs**
5 **email responds:**

6 “We will send an invitation to the other party to participate in mediation.

7
8 Please allow at least 2 weeks for the other party to respond to the invitation.

9 Our staff will review the party’s response and proceed with mediation if the
10 invitation is accepted.”

11
12
13 [The doctors did not respond after two invitations until these minutes.]

14
15 **I filled my complaint with California medical Board , no respond so far,**
16 **(Exhibit)**

17
18
19
20
21
22 **B. BALDWIN PARK POLICE DEPARTMENT HARASSMENT AND MISCONDUCT:**

23
24 1-On date May 08,2015 Baldwin Park police department tried to tow
25 my own vehicle CA License Plate #902818U.

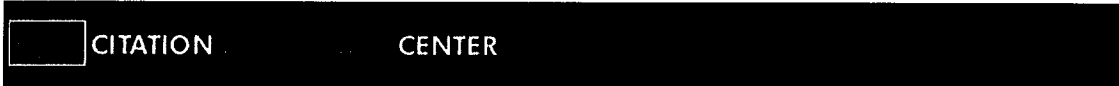
26 Although, I did registered my vehicle on date May 07, 2015, the two
27 officer did not check

28 With the department of motor vehicle, claiming that the vehicle ID
number did not come out

1 And I cat shed the AAA club the last minutes before towing my
2 vehicle.

3 2-on date May 11, 2015 the Baldwin Park police department is
4 insisting to harassing me, officer
5 Badge #2043 from Baldwin Park Police department, put parking
6 citation: BP010000920, time: 09:37 AM although , the sweeper did
7 not pass until later time 11:30 AM .

8 I paid my citation parking on May 21, 2015 .please review below :
9
10



13 **Receipt for citation:** BP010000920

14 **Confirmation number:** 7198310870

15 **Date paid:** Thursday, May 21, 2015

16 **Amount paid:** \$66.50

17 **Note:** This email was sent from a notification-only email address that cannot accept
18 incoming email. Please do not reply to this email. If you have any questions or for more
19 information, please call (800)-989-2058.
20

21 **C. Harassment since February ,2012 until now from individuals**
22 **lives with me at the same house located at:15403 sandstone street,**
23 **city of Baldwin Park, California 91706 , were pushed by Baldwin**
24 **Park police department to do so , their names :**

25 **1- Jose Gordo , drives Chevrolet pickup truck CA Lice. plate**
26 **no.7W52500**
27
28

1 **2.Rico , drives A white Honda CA Lice. plate no.6VUH794 that**
2 **person comes from work late at night around from 3:00AM to 4:00**
3 **AM ,just to start harassing me, fought**

4 **With me several times, yelling and screaming.**

- 5
6
7
8
9
- Defendants Pasadena City,State of California
 - The following Defendants Names are sued for their individual and official capacity:
 -
- 10
11
- Mayor Terry Tome k, Pasadena City
- 12
- Pasadena City council district one Tyron Hampton
 - Pasadena city council District2 Margaret McAustin,
 - District 3 John J Kennedy, District 4 Gene Masuda, District 5 Victor Gordo
 - District 6 Steve Madison, District 7Andy Wilson,
 - Pasadena Police Chief Phillip Sanchez, D chief Darryl Qualls, ED,
 - John Perez and Commander Cheryl Moody.
- 13
14
15
16
17

18
19
20 Pasadena City Address: 100 N.Garfield Ave., Suite 228, Pasadena,
21 California 91109

22
23 I believe, I have been discriminated against, because of my race, color,
24 religion or my national origin, including limited English proficiency by the
25 city of Pasadena, city officials and police department, located
26 At: 100 N Garfield Ave., Suite 228, Pasadena, California.91109 - phone:
27 626.744.4111 .those whom receiving federal financial assistance.

1 Since The above mentioned city officials and police captains and officers
2 names been pushed by the department of home land security to harassing
3 and discriminating and “attempt to murder “me personally from the period
4 May 06, 2002 until today’s date.

- 5
6 3. On May 06, 2002, Pasadena police department participated with the
7 INS. And Altadena And La cantata police department to arrests me
8 by creating file creation [using Viagra pills For Personal use] Case #
9 G A 051132.

10 **Plaintiffs’ Second Amended Complaint**

11
12
13 **INTROUDCTION**

14 **This is a civil rights law suit brought By the Plaintiff, a victim of police**
15 **brutality, False Arrest, misconduct and race discrimination , against the**
16 **people of the state of California the police officers, involved in the**
17 **brutality, and the Altadena sheriff’s detective ,state detectives and**
18 **officers The US. Customs border protection , and Los Angeles county**
19 **jail . Compensatory, punitive damages and injunctive relief are sought**
20 **against the City of Altadena and Los Angeles superior court ,City of**
21 **Pasadena Court house,Pasadena, state of California**

22 **As well.**

23 **Jurisdiction**

- 24 **1. This Court has jurisdiction under 28 U.S.C.1331 Federal question**
25 **Jurisdiction, arises pursuant to 42 U.S.C.1983.**

26 **2.**

27 **VENUE**

1 3. Venue is proper pursuant to 28 U.S.C.1391 because the
2 defendants and the Plaintiff are residents of this district, and the
3 cause of action arises in the southern district of California.

4 **Parties**

5 4. Plaintiff "mahmoud Mohamed mahmoud " resident of city of
6 West Covina, California 91793, working as Professional Income Tax
7 Preparer, has a home based business, [father for five kids].
8

9 5. Defendants the people of the state of California (California
10 Secretary of the state), 1500 11th, street, Sacramento, CA 95814,
11 Sued for their individual and official capacity.

12 complaint

13 6. Defendants Police officers and detectives of Altadena sheriff's
14 department, 780 E, Altadena dr. altdena, CA 91001, those who
15 were there time the false arrest Date May 6, 2002. sued for their
16 individual capacity.
17

18 7. Defendants Victor Garson, Law enforcement Los Angeles. Sued
19 for his individual capacity, at all the times, and time the arrest
20 was working for Los Angeles county Police department.

21 8. Defendants officer Paris Cohen, officer Miller, AND ROBERT
22 C.[DA], From law enforcement Los Angeles County.
23

24 9. Attorney District Los Angeles County, Time the arrest
25 happened.

26 On date May 6, 2002. sued for his individual and official capacity.
27
28

1 **10. Defendant : Adam Pearl, Attorney US. Immigration Court, 606**
 2 **olive street, Los Angeles, California 90014, sued for his individual**
 3 **capacity.**

4
 5 11. US. Customs Border Protection (ICE) officers, those who were
 6 there present at time the False Arrest, date May 6, 2002 happened.

7
 8 **.Statement of Facts**

9
 10 On or about May 6, 2002, plaintiff asserts that he was arrested
 11 because, he Bought enjoyable pills (Viagra) for personal use, Los
 12 Angeles Law Enforcement of City of Altadena, US. Customs
 13 Border Protection (ICE) And others Detectives from City of
 14 Pasadena, arrested him with no warrant of arrest and put him on
 15 LA Cantata Jail, then at LA County Jail, created File Criminal
 16 Case # A051132, put him under probation for three years, With fine
 17 of more than US.\$2000.

18
 19 Plaintiff stating, Due to my unfamiliarity with the rules and regulations and
 20 The Laws of the US.FDA,

21 **On date May 6, 2002 and March 10, 2003** I'm been treated unfairly at the
 22 Los Angeles, Superior court, City of Pasadena and also when I was arrested
 23 on May 6, 2002 either by LA police department [Altadena PD, and ICE] or
 24 at Pasadena Court house.

25
 26 The LA police department and the undercover police men's and women's,
 27 Took huge advantage on me that day and arrested me by Picking up the
 28 horrible of 09/11 attack on me. And since I was shocked and in complete

1 fear from them, the minute they attacked me on that day at 309 Mountain
2 View street, Altadena, CA91001

3
4 complaint

5 After ,I came from my class at Pasadena City College, City of Pasadena,
6
7 California.

8
9 I remember that day on 05/06/2002 the police officer hand me the seizure
10 Viagra Package, while he was wearing [FEDEX] uniform, tricked me and I
11 thought He's FedEx the delivery man but in fact he's not.

12
13 When I did opened for him the house front door, after he knocked the door,
14 then after a few minutes, I heard a heavy knock and high voices and too

15
16 much noise, suddenly a group of LA police departments officers , Altadena
17 police department, officers and detectives, US. Custom Border Protection

18 Under covers men's and women's with gun's on hands entered and start to
19 search Me without even showing me any order of warrant arrest or
20 permission to enter and search me and search the house.

21 Then after almost an hour or so, they locked me with the handcuff and

22
23 Pulled me to the la Canada Police Department, I stayed there from 2 to 3
24 days , then I was been sent to the county jail for one night or so.

25
26 Then I remember on the final trial court hearing at court house at city of
27 Pasadena and at the hall of the Court Room the officer arrested me that day,
28 his name [Paris Cohen] spoke to me to do the deal, and the deal is for me,

1
2 To accept the charges from the judge, and he promised to me that no one
3 will bother me from the department of Los Angeles Police department none
4 complaint

5 any more, I did accept the deal under fear and that time, I was student at
6 Pasadena City College

7 and I thought that the cops they may going to give me hard time in the
8 future

9
10 that time, I was worrying that I may not able to complete my studies that
11 was the reason I accepted the officer deal, which leaded after that , that the
12 Pasadena court house issued a felony conviction first degree, and they put

13
14 Me, on Probation for 3 years and made me to pay over US. \$2000.

15 Then now and after almost 11 years I discovered that any one has a problem
16 on his record like this, I have now, the department of home land security and
17 the immigration will ask for removal procedure , and deportation for the

18 alien, and Since I do not know the laws and the regulations that time,

19
20 I 'm here asking the court:

21 A. For Appeal and reopen for the case with Investigation, since I was
22 treated with NO Fare AT ALL,

23 B. B .Since the name on the case #GA051132 dated 05/06/2002 our
24 subject "Not the Correct and real complete name" as shown on
25 my both California Driver license and My California ID card,
I'm here by [Exhibit to Exhibit]

26 Asking for investigation with fair and for immediate clear to my case file at
27

1 The Los Angeles, Pasadena court house, and informing all government
2 agencies .

3
4 To Whom It May Concern to up-date their record as well.

5 complaint

6 C. Asking the court to return my fine the amount of over US.\$2000 plus all
7 the Expenses incurred during, The period from 05/06/2002 until now, with
8 Compensatory, the court may deem it's appropriate.

9
10 Since that Case #GA051132 was, file creation, false arrest, with no warrant
11 arrest, Race discrimination, officers mentioned above were acting under
12 Color of State.

13
14 Plaintiff mahmoud M mahmoud, resident of City of West Covina, State Of

15
16 California, here by asserts the following claims against the defendants in
17 the above and below the entitled actions.

18 .Violation of USC. 388 (1971)

19
20 a. Violation for the fourth amendment freedom of Unreasonable
21 search

22
23 b. And seizures had been violated.

24
25 c. Violation of 42 USC.1983 Arrest.

26
27 d. Violation of 42USC.1983 detention.

28 e. Violation of 42USC.1983 property search, without warrant

1
2 f. Violation of 42 USC.1983: conspiracy

3
4 g. false arrest and imprisonment

5
6
7 h. Intentional infliction of emotional distress.

8
9 19. Plaintiff : Asserting the reason I am suing now is because the false arrest

10
11 Of case GA 051132 Affected me badly

12
13 AND ACT FROM THE, US. CUSTOMS BORDER PROTECTION, ALTADENA

14
15 POLICE DEPARTMENT AND OTHERS UNDER COLOR OF STATE

16
17 LAWS, WHILE OTHER RECONSTRUCTION STATUES AUTHORIZE

18
19 MORE LIMITED CLAIMS, AGAINST PRIVATE PARIES, WHO

20
21 VIOLATES FEDERAL RIGHTS, IAM SUING NOW THE ABOVE

22
23 MENTIONED DEFENDANTSIS BECAUSE OF THAT CASE GAO51132

24
25 AFFECTED ME VERY BADLY, DEFENDANTS WERE HARMED ME,

26
27 ACCUSTIONALLY, AFFECTED ME GETTING MY GREEN CARD,

1 AND MY CITIZENSHIP, UNTIL TODAYS DATE, AND PREVENTED
 2 ME FROM SEEING MY FIVE KIDS ,UNTIL THESE MINUTES, AND
 3 FOR MORE THAN 16 YEARS, FOR NOT DOING NOTHING FROM
 4 COUNT1 TO COUNT 2, EXCEPT Purchasing ENJOIABLE PILLS FOR
 5
 6 PERSONAL USE, FROM OVERSEAS, PLEANTLY OF THOSE PILLS
 7 OVERCOUNTER, ON EACH SHELF OF EACH PHARMCY, IN THE
 8 USA.

9 Been treated un fairly either BY Altadena, LAWENFORCEMENT
 10 OR BY THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
 11 LOS ANGELES COUNTY, FOR THAT F ELONY CASE #GA051132
 12 2. Police captains and officers of the city of Pasadena still following me to
 13 each place I go , in temple city ,either to conduct business, Or to buy
 14 something for myself, which is not appropriate or acceptable, and that there
 15 is a policy Or repeated conduct that is discriminatory. Witness on that:

16 complaint
 17

- 18
- 19
- 20
- 21
- 22 1. US. Department of Justice , office of the Inspector General,
 Investigations Division
- 23 2. Department of Homeland Security, office for civil rights and civil
 24 liberties.
- 25 3. U. S .Department of Justice, Civil Rights Division, office of special
 26 counsel for immigration
 27 Related employment practices (OSC).
- 28 4. Executive office for immigration review, 5107 Leesburg pike suite
 2600, falls church, Virginia 20530

- 1 5. US. Senator Grace, EL Monte District
- 2 6. US. Senator Dianne.
- 3 7. Office the attorney district, Los Angeles, California.
- 4 8. Fair employment and housing
- 5 9. Medical board of California, central complaint unit
- 6 10. Ethics City of los Angeles, enforcement division
- 7
- 8
- 9
- 10
- 11
- 12

13 **Supervisory liability after a Ashcroft v. Iqbal**

14

15 26 .We have long permitted plaintiffs to hold supervisors individually liable

16 In 1983 Suits when culpable action, or inaction, is directly attributed to
17 them. We have never required a plaintiff seeking to state a claim for

18 supervisory liability to allege

19 That a supervisor was physically present when the injury occurred, in *larez*
20 *v.*

21 *City of los Angeles ,946F.2d 630 [9th cir.1991]*, we explained that to be held
22 Liable, the supervisor need not to be ‘directly and personally involved in the

23
24 same Way as are the individual officers who are on the scene inflicting

25
26 constitutional Injury ‘id at 645.rather ,the supervisor’s participation could

27
28 Include his own culpable action or inaction in the training supervision or

Control of his subordinates ‘his acquiescence in the constitutional deprivations of which the complaint is made, or ‘conduct that showed a Reckless or callous indifference to the rights of others.’ Id at 646[internal Citations, quotation marks, and alterations omitted].

Defendants City of West Covina, et

West Covina Police department harassment, discrimination and police brutality:

On date: April 14,2015 California pacific time 11:00 AM , I faced discrimination and harassment and police brutality from West Covina police department officer Aram’s Badge #380, and officer A. Coppi Badge #329, searched me, and my own vehicle, then Arrested me and put the handcuff on my both hands and took me to Citrus Valley intercommunity hospital at the city of Covina , to prevent me from showing up at the Superior Court of Los Angeles Courthouse second day April 15,2015 , and I lost my trial court Case # BC524336.

complaint

Plaintiffs’ Second Amended Complaint

INTROUDCTION

4. This is a civil rights law suit brought By the Plaintiff, a victim of police brutality, False Arrest, misconduct and race discrimination

1 , against the two police officers, involved in the brutality, and the
2 two law offices and the truck driver Mr. Adam Bar wick, and his
3 corporation, involved in law suit BC: 524336. And compensatory,
4 punitive damages and injunctive relief are sought against the City
5 of West Covina as well.
6
7

8 Jurisdiction

9 5. This Court has jurisdiction under 28 U.S.C.1331 Federal question
10 Jurisdiction, arises pursuant to 42 U.S.C.1983.
11

12 VENUE

13 6. Venue is proper pursuant to 28 U.S.C.1391 because the defendants
14 and the Plaintiff are residents of this district, and the cause of action
15 arises in the southern district of California.
16

17 Parties

18 4. Plaintiff "mahmoud Mohamed mahmoud " resident of city of West
19 Covina, California 91793, working as Professional Income Tax Preparer,
20 has a home based business, [father for five kids].
21

22 5. Defendant, City of West Covina is a municipal corporation, located at
23 1444 west Garvey Ave. south, West Covina, ca 91790.
24

25 6. Defendant officer Arams Badge#380, officer at West Covina police
26 department, sued for his official and individual capacity, at the time of
27 events complained of herein was, employed by the city of West Covina
28 as police officer.

1 7. Defendant officer A.Coppi Badge #329, officer at West Covina police
2 department, sued for his official and individual capacity, at the time of
3 events complained of herein was, employed by the city of West Covina ,
4 as police officer.

5
6 8. Mr. Dave Faulkner, chief police West Covina, police department, sued
7 for his official and individual capacity, at the time of events complained
8
9 herein was, employed by the city of west Covina, As Chief police west
10 Covina, police department.

11
12 9. Supervisor West Covina police department, on duty at time and date
13 the event happened date April 14th, 2015 time 11:00ARE.

14
15 10. Defendants Two unknown city employees, of city of West Covina,
16 sued for their official and individual capacity, at the time of events
17 complained herein were, employed by the city of West Covina.

18
19 11. Defendant Law Office of Jacob Sverdlov, located at 15250 Ventura
20 Blvd. Suite1220, Sherman Oaks, California 91403, sued for his
21 individual capacity, as former attorney to the plaintiff.

22
23 12. Defendant, Interinsurance Exchange of the AUTOMOBILE CLUB,
24
25 Sued for their corporation Capacity. Cancelled the insurance Policy to
26
27 The Plaintiff, same day April 14, 2015, after the events happened,

1 Since Insurance Code Section 11628 and 11628.5 make it unlawful for
2
3 Motor vehicle liability insurers to refuse to insure, refuse to continue
4
5 To insure, limit the coverage available to, or charge a different rate for
6
7 The same coverage offered to others on the basis of an individual's
8
9 Race, Language, color, religion, national origin, ancestry, disability, or
10 Geographical area.
11
12

13 13. Defendant Citrus Valley Intercommunity, Menthol Hospital, Covina,
14
15 Sued for their Corporation Capacity, for their race discrimination.
16
17

18 14. Defendant the truck driver, Mr. Adam Jacob Bar wick, (Adam Bar
19 wick, Electricity INC.) located at: **1570 HOWARD ACCESS RD STE**
20 **D UPLAND, CALIFORNIA 91786**, sued for his individual, and
21 corporation Capacity, Attempted to murder, first and second degree,
22 damaged plaintiff Vehicle Completely, injured plaintiff and caused
23 serious injuries in plaintiff,
24 Left Arm, Lower and upper Back, with serious Cervical Spine Pain,
25 Pain since The truck accident occurred on December, 15, 2011 and
26 for the future.
27
28

Statement of Facts

14. Plaintiff asserting on date Tuesday April 14, 2015, time 11:00Am. At
Parking lot of Post office West Covina, State Of California. While I am

About to pick up my mail from my mail Box at the address I mentioned
Above, next to my car was sitting a gentleman at a private black color car,

Talking in his cell phone, but he was parking too close to my own Lincoln
Ls model 2004, to be honest with you; I hardly tried to get off from my car,

Very worrying, I may hit the gentleman car next to me, but I warned him
Loudly that he needs, to give me enough space so I can get out of my car but

He did not like it or accepted it, and what threaten to call West Covina
police department on me.

I thought if I go to pick up my mail and leave him in peace, he may come

Down, and me too, but after I picked up my mail, and on my way back to

Take my car and leave, another gentleman was holding his cell phone with

Camera taking pictures for me and yelling and screaming to me that he is

With him and he is witnessing, and that they already called the cops on me,

And he start to bother me with his cell phone taking pictures for me

1
2 Personally and moving immature, and he fight's with me and beaded me up

3
4 And putting his own legs on my chest and tided my both hands, and I was

5
6 Not able to Breath, especially and I am disable and diabetic, he kept doing

7
8 That, continue holding me to the ground of the parking lot, until officer

9
10 West Covina, police department Mr...Coppi badge #329 helped me to Stand
11 up. Another officer from West Covina, police department by the

12
13 Name, Mr. Arams, his badge #380, Police report 15-2851 dated April 14,
14 2015.and police report # 15-2880 dated 4/15/2015 by officer Schultz badge
15 # 672 for [vandalism to my own vehicle Lincoln Ls model 2004 inside the
16 post office parking lot.]

17
18 Unfortunately, both officers came to me, with entire bad attitude, searching
19 My car for weapons, harassing me, questioning me with disrespect, making
20 Fun of me, and then arrested me and officer Mr.Arams took me to his police
21 Car, and while he was driving he was not paying attention and almost We
22 were going to be killed, since he almost going, to hit Mr. A Coppi police car
23 in front of, him,

24 complaint

25 Driving with careless, and laughing, immature and officer Arams dropped

26
27 Me Off at citrus valley intercommunity mental health plan, located at

28

1 Covina City to continue harassing, and making the fun of me with the

2
3 Two security officer and all the nurses and the supervisor and even the

4
5 Emergency doctor all treated me with no respect, and they put me on 72

6
7 72 hour watch, but I complained to the emergency doctor

8
9 That I have to be in the Los Angeles Superior Court [Stanley Mock]

10
11 Tomorrow morning, Wednesday April 15, 2015 at department 97 court room

12
13
14 #630 for the truck accident, the one I had on date 12/15/2011 for trial court

15
16 Hearing my Case #BC524336, but the doctor,

17
18 Did not help me, and said to me tell that to the doctor sociologist, when you
19 go upstairs.

20
21
22 I stayed at the citrus valley intercommunity from 12AM 4/14/2015 and

23
24 Discharged at 3:30 PM the second day 4/15/2015 and I lost completely my

25
26 Trial court hearing, I learned that after I called the court clerk which he told

27
28 Me that the case dismissed because neither me nor my attorney Mr. Jacob

1
2 Present to the court room at Stanley Mock, and I lost my case, since my

3
4 Attorney was found to be sided to the defendant, and legal malpractice.

5
6 Not only that but, bear with me my dear investigator, after I get discharged

7
8 From the citrus valley intercommunity, on date 4/15/2015, I arrived to

9
10 Parking lot West Covina, Post office, at 5:55PM I found my own vehicle

11
12
13 Lincoln 2004 LS, damaged [the four tires, with broken back windshield,

14
15 And scratch to my left side back door of my vehicle and I found violation

16
17 Parking ticket for US. \$60 on my front-end windshield, then I asked a

18
19 LADY was present there to call West Covina police department for me,

20
21
22 Since my cell Phone Was out of battery; Officer Schultz badge #672 came

23
24 And issued the police report #15-2880. [Crime Vandalism Police Report].

25
26 The second day after I discharged from the hospital, I received letter from
27 my insurance

1 Company, Interinsurance Exchange of the AUTOMOBILE CLUB that they
2 Cancelled my full coverage policy on my vehicle Lincoln LS 2004 and I
3 Need to contact them.

4
5
6 I have been discriminated by the West Covina police department, officer

7
8 complaint

9 Mr. Arams badge#380 and officer A.Coppi badge #329, and by the

10
11
12 Individuals involved and I am seeking Justice and charged to be pressed
13 against them in which California panel code is applicable.

14
15
16 15. TRUCK DRIVER MR. ADAM JACOB BAR WICK, OWNER ADAM
17 BAR WICK ELCTRICIRT ET AL, SUED FOR his individual, and his

18 corporation capacity, since on or about December 15,2011 time 4:00PM on
19 the Street: E/B LOS FLEIZ Blvd. W/B Hobart PL. LOS ANGELES
20 CALIFORNIA – Police Report By officer Noriega, ram 2A91 □ Serial
21 Number 40572.

22 16. Driver the electricity truck Mr. Adam Jacob Bar wick, damaged my
23 Vehicle,

24 17. came very speeding from my left side to my lane left side and hit my
25 vehicle, And injured me very badly

26 18.I sustained injuries to my Neck, lower and my upper back ,left side arm
27 and shoulder, I been diagnosed Inguinal Hernia, As well As Multiple

28 Herniated disk in my Spine.

complaint

19. Due to these injuries, I to avoid prolonged sitting, standing, and prolonged Standing.

20. Driver the electricity Truck Mr. Adam Jacob Bar Wick, Was main intend and purpose is to get me killed, since I get hit by him and his Ford super duty truck, CA lic. plate #6U22740 from my left side driver vehicle [Ford Escort 1999] Ca license Plate #5DWV720 and I believe he is "an attempting To Murder" First and second Degree.

21. since: Mr. Adam Bar wick, time my car accident, Mr. Adam saw me by his right side mirror of his Ford F450 super duty truck color white VIN#IFDXW46F91ED86899. And although I was yelling and screaming to him hey ..hey..hey stop .. stop. stop, however, Mr. Adam still and continuing pushing me hardly to the street of Los Fleiz Blvd. Pavement. I am quite very sure that Mr. Adam Bar wick by doing so, he is to be Found "Attempt to murder "with First and second Degree.

22. On December 15, 2011, I was operating my vehicle in a reasonable and prudent manner, with due caution and regard for the motor vehicle laws of the State of California.

Complaint

FIRST CAUSE OF ACTION

EXCESSIVE FORCE, SEARCH AND SEIZURE

42USC.1983

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28

15. Plaintiff re-alleges each of paragraphs 1-14 as a fully stated herein.

16. As a result of the defendant's officers' unjustified and excessive use

Of force, his car was searched for weapons, for more than three times,
and

No weapons found. Plaintiff suffered pain and injury, after he was beaten

By the two unknown city of West Covina employees, inside post office,

West Covina Parking lot, and he and his car searched for weapons, for

More than three times, plaintiff suffered emotional distress as well.

17. Plaintiff engaged in no acts of violence toward Defendant officers

Or engage in any conduct which made the use of force, and searching

Him, and his own car, described above reasonable or necessary.

18. This conduct violated the Fourth and Fourteenth Amendments to the

United States Constitution, and hence 42 USC. 1983

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28

19. The misconduct described in this count was objectively unreasonable

And was under taken intentionally with malice, willfulness, and reckless

In difference to plaintiff constitutional rights.

20. The misconduct described in this count was under taken pursuant to

The policy and practice of the city of West Covina by its police

Department in that:

a. As a matter of both policy and practice, the West Covina
Police department directly encourages, and is thereby the

Moving force behind, the very type of misconduct at issue
hereBy failing to adequately train, supervise and control its
officers

Such that its failure to do so manifests deliberate indifference;

B. As a matter of policy and practice, the West Covina police

Department, makes its officers a ware that if there are no

Cooperating witnesses or evidence which support a complaint's

Version of the events in question, a complaint of excessive

Force will never be sustained against them;

c. Municipal policy makers are aware of (and condone and

Facilitate by their inaction) a "code of silence" in the west

Covina police department, by which officers fail to report

Misconduct committed by other officers, such as the

Misconduct at issue in this case.

21. As a result of the defendant officers' and the unknown city employees

Unjustified and excessive use of force and the policy and practices of the

City of West Covina, plaintiff has, as a direct and proximate cause, suffered

Pain and injury, including emotional distress.

SECOND CAUSE OF ACTION

DUE PROCESS 42U.S.C.1983

1
2 22. Plaintiff re-alleges each of paragraphs 1-21 as if fully stated herein.
3

4
5 23. In the manner described more fully above, defendant officers and the
6
7 Two unknown city of West Covina employees, deprived plaintiff of due
8
9 Process in violation of the 14th Amendment to the United States constitution.
10

11 24. Defendants actions set forth above were so arbitrary as to shock the
12
13 Conscience, including, but not limited to, beaten plaintiff, searching him,
14
15 And his own vehicle for weapons, assault, accusing, taking the plaintiff to
16
17 The menthol hospital and putting his life in danger, without cause, knowing

18
19 That doing so was unauthorized and would cause additional pain and
20
21 Suffering, injury and emotional distress.
22

23 25. Such violations of plaintiff rights were undertaken intentionally, with
24
25 Malice and conspiracy, and willful indifference to plaintiff rights.
26

27 26. The misconduct described in this count was undertaken pursuant to the
28

1 Policy and practice of the West Covina police department in the manner

2
3 Described in preceding paragraph.

4
5 27. As a result of the above-described wrongful conduct, as well as the city

6
7 Of West Covina policy and practice, plaintiff has suffered pain and injury, as

8
9 Well as emotional distress.

10
11
12 THIRD CAUSE OF ACTION
13 CONSPIRACY TO COMMIT CONSTITUTIONAL VIOLATIONS
14 42 U.S.C.1983

15
16 28. Plaintiff re-alleges each of paragraphs 1-27 as if fully stated herein.

17
18 29. As discussed in greater detail above, some or all of the defendant officers

19
20 And the two known city of West Covina employees, conspired with each

21
22 other and /or with members of their department to prevent plaintiff from

23
24 Appearing in the superior court of Los Angeles, for his trial Court Case

25
26 #BC524336 dated Wednesday April 15th, 2015, and to cause loss to his

27
28 Court case and damage to the plaintiff in the following manner:

- 1
- 2
- 3 A. Agreeing not to report each other after witnessing and /or using
- 4
- 5 B. excessive force relative to the plaintiff.
- 6
- 7 C. Agreeing not to generate reports documenting their conduct to
- 8
- 9 D. cover-up their own and each other's misconduct;
- 10
- 11 E. Agreeing to generate reports and other documents which omitted
- 12
- 13 F. materials facts relating to the events described above and
- 14
- 15 G. containing patent falsities, such as police report #15-2851, dated ,
- 16
- 17

18 4/14/2015, changed To Incident No.5WC0022247 with omitted

19 Materials facts relating to incident.

20

21

22

23 H. Supervisor West Covina police department came to the site to

24

25 J. advise and ordered the two officers TO take the plaintiff to the

26

27

28 Menthol hospital [intercommunity Citrus Valley] so, they can

1
2
3 Prevent plaintiff from Appearing in trial court date 04/15/2015 as
4

5 Doing favor, to the truck driver, and the former attorney Mr. Jacob
6 Overdrove, and also to his partner lawyer Mr. Joe Kar .
7

8 30. The aforementioned actions of the defendant's supervisor and officers
9

10 were the direct and proximate cause of the violations of the United States
11

12 Constitution discussed above, and the attendant injury and emotional
13

14 Distress, and loss to court case.
15
16
17

18
19
20 **FOURTH CAUSE OF ACTION**

21 **ASSAULT AND BATTERY**
22

23 31. Plaintiff re-alleges each of paragraphs 1-30 as if fully stated herein.
24

25 32. As described more fully in the proceeding paragraphs, plaintiff was
26 harassed, beaten, and assaulted, by the two unknown city of West Covina,
27

28 employees , then gets arrested and searched by officer Arams Badge #380

1
2 and officer A.Coppi Badge #329, without justification or provocation.

3
4 33. the actions of the defendant supervisor, officers of West Covina, and the
5
6 two known to the plaintiff [city employees], which occurred while acting
7
8 under color of law and within the scope of their employment, constituted
9
10 unjustified and offensive physical contacts, undertaken willfully and
11
12 wantonly, proximately causing plaintiff, vandalism to his own vehicle tires,
13
14 rear windshield and body shop, plus bodily injuries and loss to his court
15
16 Trial Case #BC524336.

17
18 34. The misconduct described in this count was objectively unreasonable
19 and
20
21 was undertaken intentionally with willful indifference to plaintiff
22
23 constitutional rights

24
25 35. The misconduct described in this count was undertaken by the defendant
26
27 officers, while acting within the scope of their employment such that their
28 employer, City of West Covina, is liable for their actions.

1
2
3 36. Defendant City of West Covina is liable as principal for all torts

4
5 Committed by its agents.
6
7
8

9 FIFTH CAUSE OF ACTION
10 INDEMNIFICATION
11
12

13 37. Plaintiff re-alleges each of paragraphs 1-36 as if fully stated herein.
14

15 38- State of California law provides that public entities are directed to pay
16
17 any tort judgment for compensatory damages for which employees are liable

18
19 Within the scope of their employment activities.
20
21

22 REQUEST FOR RELIEF
23

24 WHEREFORE, the plaintiff requests:
25

26 39. Unlimited Compensatory damages, including general and special
27

28 Damages according to proof.

1
2
3 40. Any further relief, which the court may deem appropriate.
4
5

6 **Demand for Jury Trial**
7

8 41. Plaintiff hereby requests a jury trial on all issues raised in this
9 complaint.
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Defendants Google Inc. & You Tube

Defendants :

Google Inc. & YouTube, 1600 Amphitheater Parkway, Mountain View, California 94043 both are sued for their corporation capacity, For Breach of contract, Fiduciary and declaratory relief.

Consumer Complaint Agency
www.consumercomplaintagency.org
1-888-374-7305 (phone)
1-888-737-6930 (fax)

Case ID is: 6621361547

I am filing my complaint against Google Inc. and youtube, since I am member with them and partner they use my company name webpage and also my 50 video[on YouTube] and my company business website to post ADS, for all types of business, I am with Google for more than 10 years, and you tube since 2009. I complained for them to pay me , several times, they never pay me a Penny, neither Google Inc. Nor you Tube.com

complaint

My name: Mahmoud M Mahmoud
My business Name: mahmoud import export trading.

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8
9 38. On or about January 19, 2012, I checked on my application again on the web
10 Sit www.uscis.gov , I found that my application receipt ##MSC-07-800-23170,

11 Complaint

12 Was approved with oath ceremony and card production , that's the reason I
13 applied

14 for N-400, Application for Naturalization on January 19, 2012[application
15 number

16 NBC*002351518], which The DHS USCIS, denied it also on date July 2012

17 The reason they need the green card, which is never received or issued one
18 for me

19 Until this minutes. Despite I am law permanent resident since June 13, 2001
20 [EXHIBIT].

21
22 39. On or about December 19th, 2014 I reviewed my Freedom of Information
23 Act (FOIA) after it was received from my previous attorney Mr. Sedaghat,
24 I found on My FOIA file A070532464, some other information belongs, Hispanic
25 Male, A lot of information omitted and been hide it , fraudulent , and also after my
26 Application for Green Card # MSC-07-800-23170, was approved on March
27 10, 2009, and it was for Oath Ceremony , and card production , The DHS
28

1 “district23” district directors, supervisors, and officers committed fraud by order
2 from Defendant Director Mr. Robert M.Cowan

3 To stop production of my approved green card, “Shown on My FOIA file

4
5 A070532464” DHS-USCIS, INTERM CASE MANAGEMENT SOLUTION

6 [THE PAGES FROM 300 TO 305 and a lot of black pages with nothing on it and

7
8 also mixed my information record with Hispanic male, which is not appropriate
9 and not acceptable by the USA. Constitution, (see *ACLU v. DHS for FOIA Civil*
10 *action case on August 25, 2010*) see also (*ACLU v. DHS, June 5th, 2013*).

11 That’s why I filled My Federal Civil Rights Complaint, to show how bad I been

12
13 treated by DHS, US.CUSTOMS, Border Protection, Law Enforcement and other
14 government agency and individuals

15
16 Involved in my complaint, *See also, (Franco Gonzales v. holder April23, 2013)*.

17
18 40. Add to that: Facing more than 4 accidents “Attempt to murder” first and
19 second degree, in the years 2008, 2009, 2010, 2011, and 2013, last incident
20 Was at City of West Covina, April 14th &15,2015.

21
22 Defendants’ names were mentioned above my complaint previously

23
24 **FIRST CAUSE OF ACTION**

25 The defendant violated my civil rights by unlawful arrest ,abuse, searches, police
26 brutality ,harassments and misconduct [4th and 14th

27 Amendment-42U.S.C.1983, since on date April14, 2015, the defendant

1 Had city of West Covina, city officials and police captain and
2 Supervisors And officers [officer A. Coppi badge #329& officer Arams
3
4 Badge#380, Arrested me, for nothing and had me to stay at citrus
5 Valley Covina, hospital for 24 hours, they did so, to prevent me from
6
7 Appearing in my trial court hearing, for date April 15th, 2015 for my car
8
9 Accident on date December 15, 2011, trial case #BC524336, at the
10 Superior court of Los Angeles, located at 111 N. Hill ST. Los Angeles
11 California 90012, police report #15-2851.

12
13 As a result I lost my case, since neither my attorney Mr. Jacob, nor I
14 Appeared in court and the judge dismissed my case.

15
16 A. Plaintiff re alleges, paragraph 1 through 22 - ~~Page~~ 8
17

18 B. By doing the acts described in paragraph, defendants caused and
19

20 C. Or permitted the violation of plaintiffs fourth and fourteenth
21

22 Amendments rights to be free from unreasonable searches and
23

24 Seizures, thereby entitling plaintiff to recover damages ,emotional
25

26 Stress; with intend to cause fear and intimidation, pursuant to
27

28 42U.S.C. 1983, pursuant to the federal hate crimes statistics act

1 of 1990 , 28 U.S.C. &534et seq. and 42U.S.C.14141.

2
3
4 **SECOND CAUSE OF ACTION**

5
6 The defendants violated my civil rights by denying my rights to receive
7 Medical care and treatment in nondiscriminatory manners, either through
8 Health care providers under the Medi-cal program or through doctors
9 Hospitals, neurosurgery, and dentists, since the truck accident on date
10 December 15,2011 injured my left arm, my neck and my lower back
11 Which will cost , neurosurgery operations for more than .\$300,000.00 ,
12 And neither the truck insurance, nor the my medical covered the cost,
13 Also the defendants on date June 9th, 2014, permitted Dr. Edwin to do
14 Angiograms procedures for me, affected my heart and made my left arm
15 Completely disable, made me suffer and live in pain, with discomfort
16 In my entire back and neck, [I filled my complaint to California medical
17 Board on date 6/28/2015].

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21
22
23 A. Plaintiff re alleges paragraph 1 to 22

24
25 B. By doing the acts prescribed in paragraph 1, Defendants caused

26
27 C. Or permitted , the violation of his civil rights and thereby entitling
28

1 D. Plaintiffs to recover damages, emotional stress, disabilities ,
 2 Pursuant to 42U.S.C.Section 1983& pursuant to the federal hate
 3 Crimes statistics act of 1990.
 4

5
 6 THIRD CAUSE OF ACTION
 7

8 The defendants violated my civil rights first and second and fourteenth
 9 Amendments, by preventing me from visiting my family [five kids] for
 10 Long periods of times exceeded 17 years [from 4th of July 1998 to present], by
 11 Delaying processing my green card: from June 13,2001 to
 12 March 10, 2009, then made me repeat myself again by applying for
 13 Asylum application or I face removing procedure , although my green
 14 Card was approved since March 10,2009, the DHS and the USCIS
 15
 16
 17

18 Both kept it on hold, and denied my application for citizenship.
 19 [I filled my complaint to office of department of home land security
 20 Civil Rights and liberties on date 4th of July, 2015].
 21

22 *3 AG - 10 to 1968 - 22*
 23 B. plaintiff re alleges, paragraph 1 through 22

24 C. by doing the acts described in paragraph 1, defendants caused /or

25 D. permitted the violation of plaintiff's first and second, fourth and fourteenth

26 Amendments rights to be free from unreasonable searches
 27

1 And seizures, thereby entitling plaintiff to recover damages, emotional
2
3 Stress, with intend to cause fear and intimidation, pursuant to 42 U.S.C.
4
5 1983 and pursuant to the federal hate crimes statistics act of 1990,
6
7 28 U.S.C. &534 et seq and pursuant to 42U.S.C.14141.
8
9
10

11 FOURTH CAUSE OF ACTION
12

13 . The defendants violated my civil rights by “attempted to murder” me
14 Personally first and second degree to prevent me from appearing at the
15
16
17 U.S. immigration court, located at 6 olive street, Los Angeles, CA 90014 for more

18
19 Than 4 times, year 2008, 2009, 2010, 2011, and the last Time was on July 18,
20 2013.

- 21 *FROM PAGE 1 TO PAGE 52*
22 a. Plaintiff re alleges, paragraph 1, through 22 PARAGRAPH
23 b. By doing the acts described in paragraph 1, defendant caused and / or permitted
24

25 The violation of plaintiff’s fourth and fourteenth amendments rights, to be free
26

27 From unreasonable searches and seizures, thereby entitling
28

1 c. Plaintiff to recover damages, emotional stress, with intend to cause fear and
2
3 Intimidation, pursuant to the federal code for “attempt to murder first and second
4
5 Degree 18U.S.C.SECTION 1512 &42U.S.C.1983 and pursuant to
6
7 The federal hate crimes statistics act of 1990.
8
9
10

11 **FIFTH CAUSE OF ACTION**
12

13 The defendants violated my civil rights for” DUE PROCESS”, Punitive
14
15 Damages and negligence pursuant 42U.S.C.1983, 42U.S.C.12182 and
16 Government code11135.
17

18 a. Since the defendant permitted delaying the process of the plaintiff social
19 security
20 b. supplemental income from July 2nd,2013 until October
21 22, 2015, which caused the plaintiff and his family to face serious financial
22 hardship and difficulties, even the defendants permitted, West Covina , social
23 security office to harasses, discriminate, and even stop payments the plaintiff
24
25
26 monthly retirement pension for more Than 3 month’s .
27
28

PAGE TO PAGE 83

b. Plaintiff re alleges paragraph 1 through 22

c. By doing the acts prescribed above, defendants caused/or permitted the violation of plaintiff rights to due process guaranteed by the fourteenth amendment , thereby entitling plaintiff to recover punitive

d. Damages , loss of income, emotional stress , with fear and intimidation , pursuant to 42 U.S.C.1983.

Request for Relief

Wherefore, the plaintiff requests:

Unlimited compensatory damages, including general and special damages

According to proof.

Any further relief, which the court may deem appropriate.

Demand for Jury Trial

Plaintiff hereby requests a jury trial on all issues raised in this complaint.

Dated: December , 2015

Signature

By MAHMOUD M. MAHMOUD

Plaintiff in pro per,